

Forms Annotated

Sept 2020

## Constitutional Law

§ 8 Complaint, Petition, or Declaration Allegation

Jail Conditions Accounting to cruel and unusual punishment  
Violation of Eighth Amendment 4:20-cv-1351-P

- ① Tarrant County Jail which is being operated by defendants pursuant to state law, was built in Green Bay Meat packing of 2020, and was designed for a capacity of 24 inmates. The present population averages in excess of 24 people. There are 24 cells, which are designed to hold two bunks each, now hold as many as four, but still prisoners often have to sleep on the floor. Variations in water temperature and pressure render few ~~feeder~~ showers virtually useless.
- ② Visiting is ~~extremely~~ limited + (None) from Covid-19. No visiting is allowed. (Prison litigation Reform Act) PLORA. Paid for tablet tablet time for family but we don't get it.
- ③ There are no facilities or personnel for social services, exercise, recreation, reading, rehabilitation, or any other human resources to meet inmate needs.

Discipline is enforced by confinement is one of two cells the two cells in jail. The cells are concrete of padded and prisoners are stripped or placed in Moo-Moo with any notice, hearing, or finding, with no right to counsel and no independent investigation of the charges. The duration of confinement averages (2 to 6 weeks confinement.)

By reason of the manner in which defendants operate and maintain Tarrant County Jail Plaintiffs have been and are now subject to unhealthy and unsafe living conditions, including over crowding, inadequate sanitary and the imposition of discipline without due process of law.

The Conduct of defendant has deprived, and continues to deprive plaintiffs of their rights to counsel under the Sixth Amendment of the United States of Constitution (U.S. Const. Amendment Amend. VI.) has submitted them to cruel and unusual punishment in violation of the 8<sup>th</sup> Amendment to the United States Constitution (U.S. Const. Amend. VIII) And has denied them due process of Law in violation of the 14 Amendments to the Constitution of the United States (U.S. Const. Amend X/V.)

-Comment Note - Prison Conditions as amounting to cruel and unusual Punishment. 51 ALR 3d 111 Relief Under Federal Civil Right Act to state prisoners complaining of condition relation to corporate punish, punitive seg. or other similar physical discipline Measure 18 ALA Fed 7 trial stragedy proof of unconst. Cond. 24 AM. Jur. Proof of Facts 3d 467.



TARRANT COUNTY JAIL MAILROOM